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September 4, 2014

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Kari Holmes  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

**Subject: Comments on the Tentative Order Amending Waste Discharge Requirements to Allow for Participation in the Delta Regional Monitoring Program**

Dear Ms. Holmes:

Contra Costa Water District (CCWD) appreciates the opportunity to comment on the tentative order amending waste discharge requirements to allow for participation in the Delta Regional Monitoring Program (RMP). CCWD supports the development of the RMP to maintain and improve water quality in the Delta. CCWD is concerned, however, that the tentative order is premature and not ready for Regional Board consideration as there are many significant questions about the RMP that should be addressed before the tentative order is considered by the Regional Board. When information that addresses the following questions is available, it should be included in a revised tentative order:

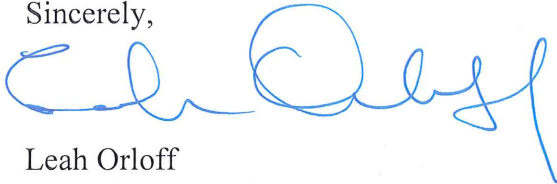
- a. How will participation in the RMP and data collected as part of the RMP be used to determine compliance for individual agencies?
- b. Where will the RMP monitoring sites be located? (Including a map would be helpful.)
- c. What constituents will be measured?
- d. What will the sampling frequency be?
- e. Will there be temporal and spatial continuity with data previously collected by individual entities?
- f. How will the RMP be coordinated with other sampling programs in the Delta and the San Francisco Bay RMP?
- g. How much would the RMP cost annually?
- h. How would those costs be divided among participating agencies and dischargers?
- i. What is the schedule for developing the RMP?

Once the RMP has been fully developed, changes to permits and participation in the RMP can be evaluated by stakeholders. CCWD respectfully requests that consideration of the tentative order be postponed until a more comprehensive description of the program can be incorporated into it.

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CCWD supports the protection of water quality in the Delta for all beneficial uses and looks forward to the continuing development of the RMP. Please call me at (925) 688-8083 or Maureen Martin at (925) 688-8323 if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Leah Orloff', with a stylized, flowing script.

Leah Orloff  
Water Resources Manager

LO/MM:wec